

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket No. _____

**ORDER GRANTING (I) LEAVE FROM LOCAL
RULE 3007-1(e) RELATED TO THE FILING OF SUBSTANTIVE
OMNIBUS OBJECTIONS TO CLAIMS AND (II) RELATED RELIEF**

Upon the motion (the “Motion”) ²of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for the entry of an order (this “Order”) (i) granting leave from the requirements of Rules 3007-1(e)(i)-(ii) and (iv) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) to: (a) permit the Debtors to exceed the number of substantive claim objections filed per month, (b) permit the Debtors to exceed the number of claims permitted to be included on substantive claim objections, and (c) not require the Debtors to raise all substantive objections to each claim in the initial substantive claim objection; and (ii) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein, if any, at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted on the basis set forth herein.
2. The Debtors are granted leave from Bankruptcy Rule 3007 and Local Rules 3007-1(e)(i)-(ii) and (iv) as set forth herein.
3. The Debtors may file more than 3 substantive omnibus objections to claims per month and may exceed the 100 claim limit per substantive omnibus objection.
4. Substantive omnibus objections to claims are not required to raise all substantive objections to each claim in the initial substantive claim objection.
5. Nothing in the Motion or this Order shall be deemed or construed: (a) as an admission as to the validity of any claim or interest against the Debtors and/or the Debtors' estates; (b) as a waiver of the Debtors' right to dispute or otherwise object to any claim or proof of interest

on any grounds or basis; or (c) to waive or release any right, claim, defense, or counterclaim of the Debtors, or to estop the Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of the Motion and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this order in accordance with the Motion.

8. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.